

Andrew M. Hutchison, SBN 029819
Loeb & Loeb LLP
Two Embarcadero Center, Suite 2510
San Francisco, CA 94111
Telephone: 415.903.3200
Facsimile: 415.903.3201
Email: ahutchison@loeb.com

Tim Warnock (*pro hac vice*)
twarnock@loeb.com
Keane Barger (*pro hac vice*)
kbarger@loeb.com
35 Music Square East, Suite 310
Nashville, TN 37203
Telephone: 615.749.8300
Facsimile: 615.749.8308
Email: twarnock@loeb.com
kbarger@loeb.com

*Attorneys for Plaintiff/Counterdefendant,
Christian Copyright
Licensing International, LLC*

Scot L. Claus, SBN 014999
Holly M. Zoe, SBN 033333
Dickinson Wright PLLC
1850 N. Central Ave., Suite 1400
Phoenix, AZ 85004
Telephone: 602.285.5000
Facsimile: 844.670.6009
Email: sclaus@dickinsonwright.com
hzoe@dickinsonwright.com
courtdocs@dickinsonwright.com

*Attorneys for Defendant/Counterclaimant
Multitracks.com, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA
PHOENIX DIVISION**

Christian Copyright Licensing International, LLC,

Plaintiff/Counterdefendant,

vs.

Multitracks.com LLC,

Defendant/Counterclaimant.

Case No. 2:23-cv-00368-DWL

**STIPULATION FOR
EXTENSION OF TIME TO
ENGAGE IN GOOD FAITH
SETTLEMENT TALKS**

1 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the
2 above captioned action, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and the
3 Court's Preliminary Order (Doc. 8), that the Parties request the Court to extend the
4 deadline to engage in good faith settlement talks from March 8, 2024, to **April 26, 2024**.
5 (See Doc. 22 ¶ 11.) The parties further request that the Court authorize the parties and
6 their counsel to meet and engage in good faith settlement talks via remote video means
7 (e.g., Zoom).

8 The parties submit that good cause justifies the requested extension of time. The
9 parties completed fact discovery, including depositions on March 1, 2024, in accordance
10 with the Court's Case Management Order. The parties believe that settlement discussions
11 will be more productive once the parties and their counsel have had a more fulsome
12 opportunity to review the pertinent documents exchanged during discovery, the
13 deposition transcripts, and expert disclosures (if any) made in the coming weeks. The
14 parties are also discussing whether to retain a third-party neutral to assist with settlement
15 discussions, and additional time would be needed to schedule a mediation with a neutral.

16 The parties further request permission to engage in good faith settlement talks via
17 remote video means, rather than in person, because the parties and their counsel in this
18 case are geographically dispersed across Arizona, California, Texas, Tennessee, and
19 Washington. The parties conducted depositions in this case via Zoom by agreement and
20 are confident that, based on that track record, they can effectively engage in good faith
21 settlement discussions via Zoom.

22 Accordingly, the parties stipulate and agree (1) to extend the deadline to engage in
23 good faith settlement talks to April 26, 2024 (2) by remote video means.

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Dated: March 8, 2024 Loeb & Loeb LLP

By: /s/ Andrew M. Hutchison

Andrew M. Hutchison

Tim Warnock

Keane Barger

*Attorneys for
Plaintiff/Counterdefendant,
Christian Copyright
Licensing International, LLC*

By: /s/ Scot L. Claus

Scot L. Claus

Holly M. Zoe

*Attorneys for
Defendant/Counterclaimant
Multitracks.com, LLC*